

REMARKS

By this amendment, Applicants have amended claims 1-3 and 17, added claim 21; and canceled claim 14, without prejudice. As a result, claims 1-13 and 15-21 are pending in this application, with claims 10-13 and 15-16 currently being withdrawn from consideration. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the objections and rejections and reserve the right to pursue the full scope of the subject matter of the original claims, or claims that are potentially broader in scope, in the current and/or a related patent application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, the Office reiterates a restriction requirement between claims 1-9 and 17-20 (Invention I) and claims 10-16 (Invention II). Applicants' undersigned representative elected Invention I, claims 1-9 and 17-20 for examination in a telephone call on January 28, 2009. Applicants thank the Examiner for his courtesy in telephoning Applicants' undersigned representative regarding the restriction requirement so that prosecution on the merits can be expedited.

Regardless, by this response, Applicants have included a new claim 21, which expressly states that the event management system enables an event provider to define the event over the Internet, provides the event provider with a link for an event registration web page that enables users to register for the event, and enables a user to register for the event using the event registration web page. To this extent, Applicants respectfully submit that examination of claims 10-16 can be performed by the Office

without serious burden. As a result, Applicants respectfully request reinstatement of claims 10-16 and substantive consideration of the subject matter of the claims.

Further, the Office rejects claims 1-3, 5-9, 17-18, and 20 under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent Application Publication No. 2002/0156787 (Jameson) in view of U.S. Patent Application Publication No. 2002/0128934 (Shaer). Applicants submit that the Office fails to establish a *prima facie* case of obviousness.

For example, with respect to claim 1, Applicants respectfully submit that the Office fails, *inter alia*, to show that the proposed combination of Jameson and Shaer teaches or suggests a marketing system that includes a promotion system and a feedback system with all of the features claimed therein. The Office acknowledges that Jameson, while it discusses emailing people invited to an event (Jameson, paragraph 0079), does not teach or suggest the claimed marketing system. In support of its rejection, the Office cites various portions of Shaer as allegedly teaching the features of the marketing system of claim 1.

In particular, the Office cites paragraphs 0158, 0308, 0403, and 0407 of Shaer as allegedly teaching a promotion system for informing a group of customers of an event. However, Applicants note that these portions of Shaer merely discuss: storage and use of contact information for event planners, vendors, staff, and guests (paragraphs 0158, 0403, 0407) and the marketing benefits to vendors of a registry system (paragraph 0308). To this extent, Shaer is primarily focused on planning an event such as a wedding, which does not require any type of promotion system for informing a group of customers of the event. Applicants have amended claim 1 to expressly state that the

event requires payment for an individual to attend and attendance at the event is not limited to invited individuals only.

As a result, Applicants respectfully request withdrawal of the rejections of claim 1 and claims 2-3 and 5-9, which depend therefrom, as allegedly being unpatentable over Jameson in view of Shaer.

With respect to claim 17, Applicants submit that the Office fails, *inter alia*, to show that the proposed combination of Jameson and Shaer teaches or suggests program code for integrating event management that includes all the features claimed therein. For example, for reasons that should be clear from the discussion of the proposed combination of Jameson and Shaer above, Applicants submit that the proposed combination of Jameson and Shaer fails to teach or suggest the program product of claim 17, including program code configured to market an event of the event provider to customers of the event provider using the customer database and the event database including all the features claimed therein. As a result, Applicants respectfully request withdrawal of the rejections of claim 17 and claims 18-20, which depend therefrom, as allegedly being unpatentable over Jameson and Shaer.

Further, the Office rejects claim 4 under 35 U.S.C. §103(a) as allegedly being unpatentable over Jameson in view of Shaer and further in view of U.S. Patent Application Publication No. 2002/0032592 (Krasnick). Applicants note that the Office relies on its rejection of independent claim 1, from which this claim depends. To this extent, Applicants incorporate the arguments presented above with respect to claim 1. Further, Applicants submit that the proposed addition of Krasnick, even if, *arguendo*,

proper, fails to address the deficiencies discussed above with respect to the rejection of claim 1. As a result, Applicants respectfully request withdrawal of this rejection.

Further, the Office rejects claim 19 under 35 U.S.C. §103(a) as allegedly being unpatentable over Jameson in view of Shaer and further in view of U.S. Patent Application Publication No. 2004/0064835 (Bellwood). Applicants note that the Office relies on its rejection of independent claim 17, from which this claim depends. To this extent, Applicants incorporate the arguments presented above with respect to claim 17. Further, Applicants submit that the proposed addition of Bellwood, even if, *arguendo*, proper, fails to address the deficiencies discussed above with respect to the rejection of claim 17. As a result, Applicants respectfully request withdrawal of this rejection.

Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary and/or in a related patent application, either of which may seek to obtain protection for claims of a potentially broader scope.

In light of the above, Applicants respectfully request withdrawal of all pending rejections of the claims. Should the Examiner require anything further to place the

application in condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

/John LaBatt/

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